



Oregon

Theodore Kulongoski, Governor

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Tom Antonoff
EHS Project Manager
General Electric Power Systems
Building 43, Room 237
One River Road
Schenectady, NY 12345

RE: Revised Storm Water Plan
Portland Inspection & Repair Service Center
2727 NW 29th Ave., Portland, Oregon
ECSI #4003

Dear Mr. Antonoff:

The Oregon Department of Environmental Quality (DEQ) reviewed the January 2007 *Storm Water Monitoring Work Plan (Revision No. 1)* for the General Electric (GE) Portland Inspection & Repair Service (I&RS) Center, 2727 NW 29th Avenue, Portland, Oregon, and has the following comments. The DEQ understands that the Portland Harbor Lower Willamette Group (LWG) has expressed interest in conducting storm water monitoring at one of the storm water discharge points at the GE site. The DEQ expects GE to address and incorporate the following comments into the Storm Water Monitoring Work Plan and initiate storm water monitoring by the end of February 2007, except those portions of the storm water monitoring that the LWG will conduct.

Section 3.3 Table 2 is referenced as providing field visual indicators of storm water quality and field water quality measurements. This information is actually summarized in Table 1.

Section 3.4.2 References to “dissolved” analyses should be deleted for catch basin solids.

Section 6.1 Validation of analytical data should be performed consistent with appropriate EPA data validation guidelines for organic chemicals and inorganic parameters.

Table 3 Add the total polychlorinated biphenyls (PCBs) probable effects concentration (PEC) for sediment.

Figure 2 DEQ understood from GE that the historic sewer line between manholes MH2 and MH5 had been plugged at MH2. Although the line is valved shut at MH5, DEQ requested the line be sealed at MH2 to prevent back-flushing up the pipe and the mobilization of legacy sediments into the City’s system. The location of the seal should be shown on Figure 2.



Table B-4 Footnotes 1 through 4 are not included in the table and should be added for completeness.

The following comments relate to the City of Portland comments on GE's workplan (see attached letter). The City of Portland has an Intergovernmental Agreement with the DEQ to investigate all City owned outfalls that discharge into Portland Harbor. Under that agreement, DEQ requests the City of Portland's comments on storm water source control efforts for sites that discharge to the City's conveyance system. At the DEQ's request, the City of Portland submitted comments on GE's January 2007 storm water monitoring work plan.

DEQ concurs with the comments submitted by the City of Portland, but has concerns that any significant changes to the sampling plan could cause delays that would prohibit GE from collecting storm water data during the 2006-2007 wet season. For that reason, DEQ recommends that GE incorporate the City's comments into its sampling plan to the extent feasible without jeopardizing implementation of the plan during this water year. In addition, the following comments clarify or emphasize DEQ's stance on certain City comments.

Section 3.1 Sampling Event Criteria and Frequency DEQ agrees that adding a way to measure and analyze settleable solids to the sampling plan could provide important data for this investigation and supports this recommendation. However, given timing issues, DEQ does not recommend adding this element to the sampling plan at this time if this change would cause an additional delay in the sampling plan of more than a week or two.

Section 3.4.1 Storm Water Sampling There are a number of comments in this portion of the City's letter that are important for ensuring this sampling plan produces data that will meet DEQ's data quality objectives. GE needs to revise its sampling plan to incorporate these changes.

- DEQ concurs with the City's concerns regarding the approach for compositing storm samples. Unless GE can provide information to allay these concerns, GE needs to change its compositing procedure as recommended by the City, i.e., "pacing the sampler with the flow meter, based on calculated discharge volumes per storm event or collecting uniform volumes per timed sampling interval for the duration of the storm."
- DEQ concurs with the City's recommendation that GE uses a 0.45 or 0.50 micron filter for filtering storm water. In addition, the filter material should be of a type that minimizes the potential for phthalate contamination and does not retain organic constituents.
- DEQ also concurs with the recommendation to analyze the samples for PCB congeners rather than PCB aroclors. EPA method 1668A is being used in other Portland Harbor storm water investigations. Congener analysis allows for a much lower method detection limit. Additionally, the models being developed to determine in-river risk use PCB congener data rather than aroclors. Reporting should include individual congeners as

well as total PCBs, and source control screening should compare total PCBs derived from the congener analyses to the total PCB screening levels provided in Table 3.

SOP-1 Storm Water Handling and Compositing Procedures, Section 4.0 Storm Water Sample Collection Procedure Because the analytical suite includes phthalates, special sampling equipment and sample handling procedures, both in the field and the lab, are necessary to minimize the likelihood that a sample will be contaminated in a manner that invalidates the phthalate data. The SOP should address this by ensuring that all equipment and supplies conform to the special requirements to the extent feasible, and by including detailed decontamination and handling procedures for field personnel. In addition, GE should and obtain confirmation from the contract laboratory that it is experienced with phthalate analysis and has procedures in place to optimize the analysis for phthalates and reduce potential sources of laboratory contamination.

The DEQ requests that GE respond to the City's comments as well as our own comments in a single response to the DEQ.

Next Steps

Please incorporate your responses to the above comments into a revised *Storm Water Monitoring Work Plan* and submit them to DEQ within 30 days of your receipt of this letter. As stated above, storm water monitoring should be initiated by the end of February 2007, so please contact me to resolve any questions on these comments.

On behalf of GE, AMEC responded in an August 3, 2006 letter to the DEQ comments on the June 2006 *Best Management Practices Guidance Manual*. Please provide me with the revised document that incorporates the requested changes.

Please call me at (503) 229-5326 to discuss the next steps or if you have questions.

Sincerely,

Tom Gainer, P.E.
Project Manager
Portland Harbor Section

Attachment

cc: Andrew Hersey, AMEC
Dana Bayuk, DEQ NWR
Karen Tarnow, DEQ NWR
Tom Roick, DEQ NWR
Linda Scheffler, BES